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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

TERESA MORALES,

Plaintiff

v.

CAROLYN W. COLVIN, Acting
Commissioner of Social Security,

Defendant.

) Case No: 2:16-cv-00230-JAD-NJK

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)
) **DEFENDANT'S MOTION FOR
EXTENSION OF TIME TO FILE CROSS-
MOTION TO AFFIRM OR NOTICE OF
VOLUNTARY REMAND OF THE CASE**

) **(Second Request)**
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)

Defendant Carolyn W. Colvin, Acting Commissioner of Social Security (the Commissioner), moves, with the approval of this Court, for an extension of time to file her Cross-Motion To Affirm or Notice Of Voluntary Remand Of The Case by thirty days from August 8, 2016 to September 7, 2016, with all other dates in this Court's Order Concerning Review Of Social Security Cases extended accordingly. This is the Commissioner's second request for an extension.

There is good cause because, since the prior extension, counsel has been handling a large number of District Court and Ninth Circuit cases in addition to this one, with counsel has been handling a large number of District Court and Ninth Circuit cases in addition to this one, with twelve briefs—one in the Ninth Circuit—due within the next thirty days. Additionally, the

1 Commissioner's counsel has had numerous other deadlines, including a dispositive motion in an
2 employment case, a settlement memorandum, and multiple mentoring and reviewing duties in
3 the Office of the General Counsel. Counsel had a conference in an employment matter and was
4 also out of the office for five days. As result, the Commissioner needs additional time to
5 properly respond to the issues Plaintiff raised in her Motion. Counsel makes this request in good
6 faith without any intention to unnecessarily delay these proceedings. The Commissioner's
7 counsel contacted Plaintiff, but at the time of filing, had not yet heard back.

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9 Respectfully submitted,

10 Date: August 8, 2016

DANIEL G. BOGDEN
United States Attorney
BLAINE T. WELSH
Chief, Civil Division

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12 By: /s/ April A. Alongi
13 APRIL A. ALONGI
Special Assistant United States Attorney

14 Attorneys for Defendant

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20 IT IS SO ORDERED.

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24 DATE: August 10, 2016


THE HONORABLE NANCY J. KOPPE
United States Magistrate Judge

DEFENDANT'S CERTIFICATE OF SERVICE

I certify that I caused a copy of Defendant's Motion For Extension Of Time To File Cross-Motion To Affirm Or Notice Of Voluntary Remand Of The Case (Second Request) to be served, via CM/ECF notice, on:

RICHARD E. DONALDSON
Esquire
gunlawyer@aol.com

Date: August 8, 2016

DANIEL G. BOGDEN
United States Attorney
BLAINE T. WELSH
Chief, Civil Division

By: /s/ April A. Alongi
APRIL A. ALONGI
Special Assistant United States Attorney

Attorneys for Defendant